



51 CORPORATE WOODS, 9393 WEST 110TH STREET, OVERLAND PARK, KANSAS 66210 (913) 642-7100

October 27, 1981

Mr. Randy D. Bradley, Div. of Environment
Hazardous Waste Management Section
Bureau of Environmental Sanitation
Topeka, Kansas

Dear Mr. Bradley,

In response to your letter dated 9/11/81, listing (4) items identified by the U.S. E.P.A. that needed to be corrected to bring us in compliance with RCRA Regulations, the following action has been taken.

1. An inspection schedule consistent with the requirements of Sections 265.15 and 265.174 of the RCRA regulations has been prepared and is available for review, an inspection log has also been prepared.
2. Pursuant to Section 260.20 at the RCRA regulations, we would like to petition for a modification of the requirement in Section 265.176 that containers holding ignitable or reactive waste must be located at least 50 feet from the property line of our plant. We think such a modification would be appropriate at our plant for the following reasons:
 - (a) Storage of our containers of ignitable or reactive hazardous waste at least 50 feet from the property line would require that they be inside the production building; this would result in potentially unsafe crowding of the workplace and reduced aisle space available to emergency response personnel and equipment in the event of an emergency.
 - (b) Routine inspections of the drum storage area would detect potential problems before the onset of emergency conditions.
 - (c) The storage of ignitable or reactive drummed waste near the plant property line is no more dangerous than the storage of ignitable or reactive drummed raw or finished goods near the plant property line.
 - (d) If the drummed waste ignitables were moved as far as possible from the property line without being relocated to within the production building, they would still not be 50 feet from the property line, and they would be placed up against the exterior wall of the production building in violation of our property insurance policy.



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- (e) If drummed waste ignitables had to be stored inside the production building, then other raw materials or finished goods would be displaced to the outside area; such an arrangement would involve substantial operating inefficiency without any clear gain in waste management safety.
3. Aisle space as required in Section 265.35 has been provided.
4. A contingency plan based on Sections 265.51 - 265.54 has been prepared and is available for review, the local fire department has expressly stated that it does not want a copy of any plant's contingency plan as it would be likely to delay and confuse the response to an emergency.

Sincerely,

W. W. Bradley
W. W. Bradley
Plant Manager
Olin Water Services

WWB:je

cc: B. Davidoff
H. Day
R. S. Hendey
B. M. Madsen
J. Sandoval
M. W. Pelley
H. Rubenstein
W. Dame

